

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MICHAEL AND SHELLIE GILMOR,
et al.,

Plaintiffs,

vs.

PREFERRED CREDIT CORPORATION,
et al.,

Defendants.

Case No. 4:10-cv-00189-ODS

**PLAINTIFFS' MOTION FOR ADDITIONAL TIME
TO ALLOW FOR FILING OF MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

COME NOW Plaintiffs, by and through counsel, and respectively request an additional seven days, up to and including December 21, 2012, to finalize the settlement agreements with Defendant JPMorgan Chase Bank, N.A., as Former Trustee ("Settling Defendant"). In support of their Motion, Plaintiffs state:

1. Plaintiffs and Settling Defendant achieved agreements to settle the claims in this matter. The settlement agreements, if approved, will settle and resolve the claims of those class members who obtained loans for which Plaintiffs seek to hold the Settling Defendant liable.

2. In light of these settlements, the Court suspended all deadlines relating to Settling Defendant and ordered that Motions for Preliminary Approval of Settlements be filed on or before November 1, 2012. The Court recently extended that deadline for the Settling Defendant to December 14, 2012 (Doc. #838).

3. Plaintiffs and Settling Defendant have diligently been working to memorialize their settlements and implement the process through which the settlement can be finalized and

submitted to the Court for approval. However, due to an unexpected personal family emergency, counsel for Settling Defendant has been summoned out of town, which hampers Settling Defendant's ability to review and execute the final settlement documents. Because of those circumstances Plaintiffs volunteered to file the instant motion.

4. For these reasons, Plaintiffs respectfully request an extension of time to file their respective Motion for Preliminary Approval of Settlement and any associated documents on or before December 21, 2012.

5. Plaintiffs' counsel has consulted with Settling Defendant's counsel concerning the contents of this Motion and indicated Settling Defendant does not oppose the relief requested herein.

6. WHEREFORE, Plaintiffs respectfully request an additional week, up to and including December 21, 2012 for the filing of any Motions for Preliminary Approval of Class Action Settlements regarding Defendant JPMorgan Chase Bank, N.A., as Former Trustee.

Dated: December 14, 2012

Respectfully submitted,

WALTERS BENDER STROHBEHN
& VAUGHAN, P.C.

By: /s/ R. Frederick Walters

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**ATTORNEYS FOR PLAINTIFFS
AND CLASS COUNSEL**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 14th day of December, 2012, I electronically filed the above and foregoing document with the Clerk of Court of the Western District of Missouri using the Court's ECF system, which will send notification of said filing to all counsel of record who are ECF participants. In addition, a copy was served by U.S. mail, First-Class Postage Prepaid, to:

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/s/ *R. Frederick Walters*